

Van Waters & Rogers Inc.
subsidiary of **Univar**

BOX 5287
DENVER, CO 80217
PHONE (303) 388-5651
FAX (303) 321-3188

August 21, 1993

Kevin Schanilec
RCRA Compliance
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED
AUG 23 1993
RCRA COMPLIANCE SECTION

FILE COPY

RE: NPDES Permit Application
Van Waters & Rogers Inc. - Portland, Oregon

Dear Mr. Schanilec:

Van Waters & Rogers Inc. (VW&R) received notification from the Oregon Department of Environmental Quality (DEQ) that the NPDES Permit application for the discharge of treated ground water from VW&R's Portland Oregon facility into the City of Portland's storm sewer system was rejected. The rejection was based on concerns raised during the public review period by the City of Portland. Specifically, the City was concerned over the high concentrations of Cyanide (50 ppb) and Ammonia (26ppm) present in samples of ground water collected from monitoring wells at the Portland facility. In addition, Mr. John Huntington of the City believes that the BOD and COD levels are anomalously high and could be detrimental to the biota of the Willamette River.

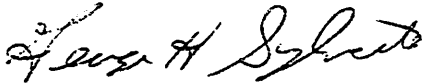
The DEQ offered several options that are available to VW&R concerning the disposal of treated ground water:

1. Re-open negotiations with the City over storm sewer discharge.
2. Obtain the City's approval for discharge into the Sanitary Sewer System (this option was VW&R's original choice but was rejected by the City).
3. Reinject the treated ground water into the aquifer pursuant to appropriate permits.

VW&R intends to discuss these options with the DEQ and the City of Portland and believes that a representative of the EPA should be in attendance at this meeting as well.

I would like to hold the meeting at VW&R's Portland facility either next week or early in September. Please call me at your earliest convenience with your thoughts on this matter. I will be in the field this week, however I may be contacted via our corporate PhoneMail System at (800) 284-6264 Ext. 3928.

Sincerely,

A handwritten signature in cursive script, appearing to read "George H. Sylvester".

George H. Sylvester
Senior Project Manager
Environmental Affairs

cc: P. Fink - DEQ
J. Huntington - City of Portland
W. Grotheer - Univar
K. Weems - VW&R

July 30, 1993

George Sylvester
Senior Project Manager
Environmental Affairs
Van Waters & Rogers, Inc.
6100 Carillon Point
Kirkland, WA. 98033

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

NORTHWEST REGION

Re: NPDES Permit Application
Application Number 997438
File Number 100517
Multnomah County

Dear Mr. Sylvester:

The Oregon Department of Environmental Quality is unable to issue a National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit for the discharge into the City of Portland storm sewer system for process wastewater originating from the groundwater treatment system located at 3950 N.W. Yeon Avenue, Portland, Oregon.

Oregon Administrative Rule 340-41-026(3) provides that no discharges to surface waters shall be allowed unless it can be demonstrated that, among other requirements, the discharge would not cause water quality standards to be violated {OAR 340-41-026 (3)(a)}. According to information presented in the application, there are pollutants present in the treated groundwater that will not receive adequate treatment to meet water quality standards, since it appears that the treatment will focus primarily on removal of volatile organics. The application states that the concentration of ammonia present in the wastewater is 26.4 mg/l. The treatment system proposed at the site does not provide for a reduction in the ammonia concentration through adjustment of pH and/or temperature as needed to meet ambient water quality criteria. In addition, the proposed treatment system does not provide for a reduction of the concentration of cyanide from the 50 ug/l given in the application to either acute or chronic toxicity values of 22 ug/l and 5.2 ug/l, respectively.

During the public comment period for the draft NPDES permit, the City of Portland expressed considerable concern about accepting the treated groundwater into the storm sewer system. You recently submitted information to City staff indicating the levels of contamination in each of the monitoring wells. The City staff have determined that the storm sewer system will not be an appropriate point of discharge for the treatment system you propose based on the varying levels of



1500 SW First Avenue
Suite 750
Portland, OR 97201-5884
(503) 229-5263
DEQ-1

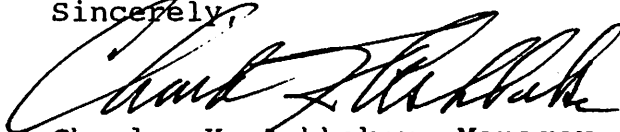
George Sylvester
July 30, 1993
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contamination in each of the wells.

The Department urges that Van Waters and Rogers resume discussions with the City of Portland to allow the discharge of the wastewater into the Portland sanitary sewer, as originally proposed, or further discuss the treatment needed to allow the entire discharge into the City's storm sewer system. If this is not feasible, the Department suggests that you consider additional treatment measures that would allow the treated groundwater to be reinjected back into the underlying aquifer through issuance of a Water Pollution Control Facilities (WPCF) Waste Discharge Permit. The Department will hold the fees that were paid for the NPDES permit until Van Waters and Rogers reaches a decision on the best course of action for disposal of the treated groundwater.

Please do not hesitate to contact me or my staff if the Department can be of any assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles K. Ashbaker", written over a horizontal line.

Charles K. Ashbaker, Manager
Water Quality, Northwest Region

CKA:plf

cc: Pamela Fink, DEQ, NWR
John Huntington, City of Portland
Water Quality, DEQ, HQ